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U.S. DISTRICT COURT
 2009 MAY 27 P 3:17
 DISTRICT OF UTAH
 FILED - 5/27/2009
 CLERK'S OFFICE

IN THE UNITED STATES DISTRICT COURT
 DISTRICT OF UTAH, CENTRAL DIVISION

SEALED

UNITED STATES OF AMERICA, : Case No.: 2:09 CR 044 CW
 Plaintiff, : **S E A L E D**
 vs. : SUPERSEDING INDICTMENT
 JEANNE H. REDD and JAMES D. REDD, : VIO. 16 U.S.C. § 470ee, 18 U.S.C. §§
 Defendants. : 641, 1163, 2
 : TRAFFICKING IN STOLEN
 : ARTIFACTS, THEFT OF
 : GOVERNMENT PROPERTY, THEFT
 : OF TRIBAL PROPERTY, AIDING
 : AND ABETTING, FORFEITURE

The Grand Jury charges:

COUNT 1

On or about September 19, 2007, in the Central Division of the District of Utah,

JEANNE H. REDD,

defendant herein, did receive, conceal, and retain property of the United States with a value of more than \$1,000, to wit: a black on white ceramic mug, with the intent to convert it to her own use or gain, knowing it to have been embezzled, stolen, purloined or converted, all in violation of 18 U.S.C. § 641.

COUNT 2

On or about September 19, 2007, in the Central Division of the District of Utah,

JEANNE H. REDD,

defendant herein, did receive, conceal, and retain property belonging to an Indian tribal organization, with a value of more than \$1,000 to wit: a hafted axe, knowing such property to have been embezzled, stolen, or converted, all in violation of 18 U.S.C. § 1163.

COUNT 3

On or about September 19, 2007, in the Central Division of the District of Utah,

JEANNE H. REDD,

defendant herein, did receive, conceal, and retain, property belonging to an Indian tribal organization, with a value of more than \$1,000 to wit: a gourd necklace, knowing such property to have been embezzled, stolen, or converted, all in violation of 18 U.S.C. § 1163.

COUNT 4

On or about March 27, 2008, in the Central Division of the District of Utah,

JEANNE H. REDD and JAMES D. REDD,

defendants herein, did receive, conceal, and retain property belonging to an Indian tribal organization, with a value of more than \$1,000 to wit: an effigy bird pendant, knowing such property to have been embezzled, stolen, or converted, and did aid and abet therein, all in violation of 18 U.S.C. § 1163 and 2.

COUNT 5

On or about March 27, 2008, in the Central Division of the District of Utah,

JEANNE H. REDD,

defendant herein, did knowingly purchase, sell, exchange and receive archaeological resources, to wit: two stone pendants for two pendants, which were excavated or removed from public lands in violation of Federal law, which resources were valued in excess of \$500, all in violation of 16 U.S.C. § 470ee.

COUNT 6

On or about October 6, 2008, in the Central Division of the District of Utah,

JEANNE H. REDD,

defendant herein, did knowingly sell and offer to sell archaeological resources, to wit: four sandals, which were excavated or removed from public lands in violation of Federal law, which resources were valued in excess of \$500, all in violation of 16 U.S.C. § 470ee.

COUNT 7

On or about October 6, 2008, in the Central Division of the District of Utah,

JEANNE H. REDD,

defendant herein, did embezzle, steal, purloin and knowingly convert to her own use and without authority, did sell property of the United States with a value of more than \$1,000, to wit: four sandals belonging to the United States, all in violation of 18 U.S.C. § 641.

NOTICE OF INTENTION TO SEEK CRIMINAL FORFEITURE

As a result of committing the offenses alleged in Counts 1 through 7 of this Indictment, the Defendant shall forfeit to the United States pursuant to 16 U.S.C. §470gg(b) all archaeological resources with respect to which a violation of 16 U.S.C. § 470ee(b) occurred and all vehicles and equipment of any person which were used in any manner or part to commit and facilitate the commission of such offense.

The defendant shall also forfeit to the United States pursuant to 18 U.S.C. §§ 981(a)(1)(C), 1956(c)(7)(D) and 28 U.S.C. § 2461 any property, real or personal, which constitutes or is derived from proceeds traceable to violations of 18 U.S.C. § 641.

If any of the property described above, as a result of any act or omission of the Defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without

difficulty, the United States of America shall be entitled to forfeiture of substitute property pursuant to 21 U.S.C. § 853(p), as incorporated by 18 U.S.C. § 982(b)(1) and 28 U.S.C. § 2461(c).

A TRUE BILL:

(Signature)

FOREPERSON OF THE GRAND JURY

BRETT L. TOLMAN
United States Attorney

RELL

RICHARD D. McKELVIE
CARLIE CHRISTENSEN
Assistant United States Attorneys